

United States District Court  
Western District of Texas  
Austin Division

**Jerome Schmidt,**  
Plaintiff,

v.

**United States of America**  
Defendant.

No. 1:18-CV-00088-DAE

**Defendant's Amended Exhibit List**

In accordance with the Court's Order at Docket 57, the United States files the following amended list of exhibits that the United States intends to offer for admission:

JOINT EXHIBITS (MEDICAL RECORDS)

The United States incorporates by reference the joint exhibits listed by Schmidt. Dkt. 77 at 2-29 (listing J-EX 1-15). The parties have agreed that these exhibits should be preadmitted.

GENERAL EXHIBITS

Number	Description	Offered	Admitted
G-1	Toyota Photos		
G-2	Texas Peace Officer's Report-October 13, 2015		
G-3	Van Photos		
G-4	Aerial View of Accident Scene		
G-5	South Lamar Street Picture		
G-6	Van Repair Estimate		
G-7	Scott Bayley CV		
G-8	Margot Burns CV		
G-9	Kyle Boone CV		
G-10	Julio Chalela CV		
G-11	Christopher Loftus CV		

G-12	Richard Watson CV		
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## ARTICLES &amp; MEDICAL AUTHORITIES

Number	Description	Offered	Admitted
G-13	American Academy of Neurology, <i>Update Evaluation and management of concussion in sports</i> (2013)		
G-14	Anand, A., Li, Y. Wang, Y. , Wu, J., Gao,S., Bukhari,L,...& Lowe,M. J., <i>Activity and connectivity of brain mood and regulating circuit in depression: a functional magnetic resonance study</i> , Biological psychiatry (2005)		
G-15	Arnold, G. Boone, K.B., Lu.P., Dean, A. Wen,J., Nitch, S., & McPherson, S, <i>Sensitivity and specificity of finger tapping test scores for the detection of suspect effort</i> , The Clinical Neuropsychologist (2005)		
G-16	Asken BM <i>et al</i> , <i>Diffusion tensor imaging (DTI) findings in adult civilian military and sports-related mild traumatic brain injury (mTBI): a systematic review</i> , Brain Imaging and Behavior, 12:585-612 (2018)		
G-17	Beason-Held, L.L., Moghekar,A. Zonderman, A.B., Draut, M.A. & Resnick, S.M., <i>Longitudinal changes in cerebral blood flow in the older hypertensive brain</i> , Stroke (2007)		
G-18	Beauchet, O., <i>Testosterone and cognitive function: current clinical evidence of a relationship. European Journal of Endocrinology</i> (2006)		
G-19	Belanger, H.G., & Vanderploeg, R.D., <i>The neuropsychological impact of sports-related concussion; a meta-analysis</i> , Journal of the International Neuropsychological Society (2005)		
G-20	Belanger, H.G., Curtiss, G. Demery, J.A., Lebowitz, B.K., & Vanderploeg, R.D., <i>Factors moderating neuropsychological outcomes following mild traumatic brain injury: A meta-analysis</i> , Journal of the International Neuropsychological Society (2005)		
G-21	Benbadis, SR. <i>The tragedy of over-read EEGs and wrong diagnoses of epilepsy</i> , Editorial (2010)		
G-22	Benitez, A. & Gunstad, J., <i>Poor sleep quality diminishes cognitive functioning independent of depression and anxiety</i>		

	<i>in healthy young adults</i> , The Clinical Neuropsychologist (2012)		
G-23	Bigler, E.D., <i>Neuropsychological testing defines the neurobehavioral significance of neuroimaging-identified abnormalities</i> . Archives of clinical neuropsychology (2001)		
G-24	Binder, L.M., Rohling, M.L. & Larrabee, G.J. <i>A review of mild head trauma. Part I: Meta-analytic review of neuropsychological studies</i> , Journal of clinical and experimental neuropsychology (1997)		
G-25	Boone, K.B., Lesser, I.M., Miller, B.L., Wohl, M., Berman, N. Lee, A., ... & Back, C., <i>Cognitive functioning in older depressed outpatients: Relationship of presence and severity of depression to neuropsychological test scores</i> . Neuropsychology (1995)		
G-26	Boone, K.B., Lu, P. & Wen, J., <i>Comparison of various RAVLT scores in detection of noncredible memory performance</i> , Archive of Clinical Neuropsychology (2005)		
G-27	Boone, K.B., Miller, B.L., Lesser, I.M., Mehringer, C.M., Hill-Gutierrez, E., Goldberg, M.A., & Berman, N.G., <i>Neuropsychological correlates of white-matter lesions in healthy elderly subjects: a threshold effect</i> , Archives of Neurology (1992)		
G-28	Buckley, T.A., Munkasy, B.A., & Clouse, B.P., <i>Acute cognitive and physical rest may not improve concussion recovery time</i> , The Journal of head trauma rehabilitation, (2016)		
G-29	Bucks, R.S., Olaithe, M. & Easterwood, P. <i>Neurocognitive function in obstructive sleep apnea: A meta-review</i> . Respirology (2013)		
G-30	Canessa, N., Castronovo, V., Cappa, S.F., Aloia, M.S., Marelli, S., Falini, A., ... & Ferini-Strambi, L., <i>Obstructive sleep apnea: brain structural changes and neurocognitive function before and after treatment</i> . American Journal of Respiratory and Critical Care Medicine (2011)		
G-31	Carolozzi, N.E., Grech, J., & Tulsky, D.S., <i>Memory functioning in individuals with traumatic brain injury: An examination of the Weschler Memory Scale-Fourth Edition (WMS-IV)</i> , Journal of clinical and experimental neuropsychology (2013)		
G-32	Carroll, L., Cassidy, J.D., Peloso, P., Borg, J., Von Holst, H., Holm, L., Ill & Pepin, M., <i>Prognosis for mild traumatic brain</i>		

	<i>injury: results of WHO Collaborating Centre Task Force on Mild Traumatic Brain Injury</i> . Journal of rehabilitation medicine (2004)		
G-33	Chaleda, Julio A., <i>Neurologists in Iraq Five Years Later</i> , Contemporary Issues in Neurological Practice (2012)		
G-34	Crane, P.K., Gibbons, L.E., Dams-O'Connor, K., Trittschuh, E., Leverenz, J.B., Keene, C.D.,...& Schneider, J.A. <i>Association of traumatic brain injury with late-life neurodegenerative conditions and neuropathologic findings</i> . JAMA neurology (2016)		
G-35	<i>Detection, Diagnosis and Management of Dementia</i> , American Academy of Neurology Guideline Summary for Clinicians		
G-36	Diaz-Asper, C.M., Schretlen, D.J., & Pearlson, G.D., <i>How well does IQ predict neuropsychological test performance in normal adults?</i> Journal of the International Neuropsychological Society (2004)		
G-37	DiFazio, M., Silverberg, N.D., Kirkwood, M.W., Bernier, R., & Iverson, G.L., <i>Prolonged activity restriction after concussion: are we worsening outcomes?</i> , Clinical pediatrics (2016)		
G-38	Dikmen <i>et al</i> , <i>Neuropsychological Outcome at 1-Year Post Head Injury</i> , Neuropsychology (1995)		
G-39	Dikmen, S.S., Corrigan, J.D., Levin, H.S., Machamer, J., Stiers, W. & Weisskopf, M.G., <i>Cognitive outcome following traumatic brain injury</i> , The Journal of head trauma rehabilitation (2009)		
G-40	Eastley, R., Wicock, G.K., & Bucks, R.S., <i>Vitamin B12 deficiency in dementia and cognitive impairment: the effects of treatment on neuropsychological function</i> , International journal of geriatric psychiatry (2000)		
G-41	<i>Ethical Principles of Psychologists And Code Of Conduct</i> Adopted Aug 21, 2002, Effective Jun 1, 2003 With 2010 Amendments Adopted Feb 20, 2010 Effective Jun 1, 2010.,		
G-42	Ettenhofer, M.L., & Abeles, N. <i>The significance of mild traumatic brain injury to cognition and self-reported symptoms of long-term recovery from injury</i> , Journal of clinical and experimental neuropsychology (2009)		
G-43	Evans, RW, <i>Postconcussion Syndrome</i> , UpToDate,		

G-44	Frencham, K.A., Fox, A.M. & Maybery, M.T. <i>Neuropsychological studies of mild traumatic brain injury: A meta-analytic review of research since 1995</i> . Journal of Clinical and Experimental Neuropsychology (2005)		
G-45	Godbolt, A.K., Cancelliere, C., Hincapie, C.A., Marras, C., Boyle, E., Kristman, V.L., ... & Cassidy, J.D., <i>Systematic review of the risk of dementia and chronic cognitive impairment after mild traumatic brain injury: results of the International Collaboration on Mild Traumatic Brain Injury Prognosis</i> : Archives of physical medicine and rehabilitation (2014)		
G-46	Greiffenstein, M.F., <i>Clinical myths of forensic neuropsychology</i> , The Clinical Neuropsychologist		
G-47	Gruber, S.A., Silveri, M.M. & Yurgelun-Todd, D.A. (2007) <i>Neuropsychological consequences of opiate use</i> . Neuropsychology review (2009)		
G-48	Guidelines for Concussion and TBI and Persistent Symptoms: 3 <sup>rd</sup> Ed., Canadian Guidelines.		
G-49	Harvey, PD <i>et al</i> , <i>Clinical applications of neuropsychological assessment</i> , Dialogues in Clinical Neuroscience (2012)		
G-50	Hawkins, K.A., Tulskey, D.S., <i>The influence of IQ stratification on WAIS-III/WMS-III FSIQ-general memory index discrepancy base-rates in the standardization sample</i> . Journal of the International Neuropsychological Society (2001)		
G-51	Heilbronner <i>et al</i> , <i>American Academy of Clinical Neuropsychology Consensus Conference Statement on the Neuropsychological Assessment of Effort, Response Bias, and Malingering</i> , The Clinical Neuropsychologist (2012)		
G-52	Katzman, G.L., Dagher, A.P., & Patronas, N.M.J., <i>Incidental findings on brain magnetic resonance imaging from 1000 asymptomatic volunteers</i> . JAMA (1999)		
G-53	Kim, B.S., Illes, J. Kaplan, R.t., Reiss, A., & Atlas, S.W., <i>Incidental findings on pediatric MR images of the brain</i> . American Journal of Neuroradiology (2002)		
G-54	Lange RT <i>et al</i> , <i>Postconcussion symptom reporting is not associated with diffusion tensor imaging findings in the subacute to chronic phase of recovery in military service members following mild traumatic brain injury</i> , Journal of Clinical and Experimental Neuropsychology (2019)		

G-55	Larrabee <i>et al</i> , <i>Meta-Analytic Methods and the Importance of Non-TBI Factors Related to Outcome in Mild Traumatic Brain Injury: Response to Bigler et al</i> , The Clinical Neuropsychologist (2013)		
G-56	Larson, EB. <i>Evaluation of cognitive impairment and dementia</i> , UpToDate		
G-57	Lorenzetti, V., Allen, N.B., Fornito, A., & Yucel, M. <i>Structural brain abnormalities in major depressive disorder: a selective review of recent MRI studies</i> . Journal of affective disorders (2009)		
G-58	Martin, P.K., Schroeder, R.W., & Odland, A.P., <i>Neuropsychologists' validity testing beliefs and practices: A survey of North American professionals</i> , The Clinical Neuropsychologist (2015)		
G-59	McCrea, M., <i>Mild traumatic brain injury and postconcussion syndrome: The new evidence base for diagnosis and treatment</i> , Oxford Workshop Series: American Academy of Clinical Neuropsychology (2008)		
G-60	McCrea, M., Guskiewicz, K., Randolph, C., Barr, W.B., Hammeke, T.A., Marshall, S.W., & Kelly, J.P. <i>Effects of symptom-free waiting period of clinical outcome and risk of reinjury after sport-related concussion</i> . Neurosurgery (2009)		
G-61	Miller, J.W. <i>Solving the Dilemma of EEG misinterpretation</i> , Editorial, Neurology (2013)		
G-62	Moor, H.M., Eisenhauer, R.C., Killian, K.D., Proudfoot, N., Henriques, A.A., Congeni, J.A., & Reneker, J.C, <i>The relationship between adherence behaviors of recovery time in adolescents after a sports-related concussion</i> , Neurosurgery (2015)		
G-63	Morris, Z, Whiteley, W.N., Longstreth, W.T., Weber, F., Lee, Y.C., Tsushima, Y....& Salman, R.A.S, <i>Incidental findings on brain magnetic resonance imaging: systematic review and meta-analysis</i> . BMJ (2009)		
G-64	Naess-Schmidt, ET <i>et al</i> , <i>Diffusion MRI findings in patients with extensive and minimal post-concussion symptoms after mTBI and healthy controls: a cross-sectional study</i> , Brain Injury (2018)		
G-65	Palmer, B.W., Boone, K.B., Lesser, I.M., & Wohl, M.A. <i>Base rates of "impaired" neuropsychological test</i>		

	<i>performance among healthy older adults</i> . Archives of Clinical Neuropsychology (1998)		
G-66	Panayiotou, A., Jackson, M., & Crowe, S.F., <i>A meta-analytic review of the emotional symptoms associated with mild traumatic brain injury</i> . Journal of Clinical and Experimental Neuropsychology (2010)		
G-67	Pertab, JL <i>et al</i> , <i>Limitations on mild traumatic brain injury meta-analyses</i> , Brain Injury (2009).		
G-68	Plassman, B.L., Havlik, R.J. , Steffens, D.C., Helms, M.J., Newman, T.N., Drosdick, D., ...& Guralnik, J.M., <i>Documented head injury in early adulthood and risk of Alzheimer's disease and other dementias</i> . Neurology (2000)		
G-69	Ramalho J. <i>et al</i> , <i>Dementia resulting from traumatic brain injury</i> , Dement Neuropsychol (2015)		
G-70	Reddy C. <i>Postconcussion Syndrome: A Psychiatrist's Approach</i> , PM&R (2011)		
G-71	Rohling, RL <i>et seq.</i> , <i>A Meta-analysis of Neuropsychological Outcome After Mild Traumatic Brain Injury: Re-analyzes and Reconsiderations of Binder et al</i> , The Clinical Neuropsychologist, The Clinical Neuropsychologist (2011)		
G-72	RSNA Statement on Traumatic Brain Injury (TBI) Imaging (Updated 9/13/2018)		
G-73	Russell, E., <i>Toward an explanation of Dodrills observation: High neuropsychological test performance does not accompany high IQs</i> , The Clinical Neuropsychologist (2001)		
G-74	Salerno, J.A., Murph, D.G., Horwitz, B., DeCarli, C. Haxby, J.V., Rapoport, S.I., & Schapiro, M.B., <i>Brain atrophy in hypertension. A volumetric magnetic resonance imaging study</i> , Hypertension (1992)		
G-75	Scahill, RI <i>et al</i> , <i>A Longitudinal Study of Brain Volume Changes in Normal Aging Using Serial Registered Magnetic Resonance Imaging</i> , Arch Neurol (2003)		
G-76	Schoechlin, C., & Engel, R.R., <i>Neuropsychological performance in adult attention-deficit hyperactivity disorder: Meta-analysis of empirical data</i> , Archives of Clinical Neuropsychology (2005)		
G-77	Schretlen, D.J., & Shapiro, A.M., <i>A quantitative review of the effects of traumatic brain injury on cognitive functioning</i> , International review of psychiatry (2003)		



G-78	Shenton, ME, <i>Mild Traumatic Brain Injury: Is DTI ready for the courtroom</i> , Int. J of Law and Psychiatry (2018)		
G-79	Shively, SS <i>et al</i> , <i>Dementia Resulting From Traumatic Brain Injury</i> , Arch Neurol (2012).		
G-80	Singer, R.B., <i>Incidences of seizures after traumatic brain injury-a 50-year population survey</i> , Journal of insurance Medicine of New York (2001)		
G-81	Smith SJM, <i>EEG In Neurological Conditions Other Than Epilepsy: When Does It Help, What Does It Add?</i> , J Neurol. Neurosurg Psychiatry (2005)		
G-82	Stein, RA <i>et al</i> , <i>A Review of the Neuropsychological Effects of Commonly Used Prescription Medications</i> , Archives of Clinical Neuropsychology (1998).		
G-83	Stranks, E.K. & Crowe, S.F., <i>The acute cognitive effects of zopiclone, zolpidem, zaleplon, and escopiclone: a systematic review and meta-analysis</i> , Journal of clinical and experimental neuropsychology (2014)		
G-84	Thatcher, RW <i>et al</i> , <i>EEG discriminant analyses of mild head trauma</i> , Electroencephalography and clinical Neurophysiology (1989)		
G-85	Thomas, D.G. Apps, J.N., Hoffman, R.G., McCrea, M. & Hammeke, T. <i>Benefits of strict rest after acute concussion: a randomized controlled trial</i> . Pediatrics (2015)		
G-86	Viano, David, <i>Concussion, Diffuse Axonal Injury, and AIS4+ Head Injury in Motor Vehicle Crashes</i> , Traffic Injury Prevention (2015)		
G-87	Weaver LK <i>et al</i> <i>Comprehensive Evaluation of Healthy Volunteers Using Multi-Modality Brain Injury Assessments: An Exploratory, Observational Study</i> , Frontiers in Neurology (2018)		
G-88	Wortzel <i>et al</i> , <i>The Potential for Medicolegal Abuse: Diffusion Tensor Imaging in Traumatic Brain Injury</i> , AJOB Neuroscience (2014)		
G-89	Yaouhi, K., Bertran, F., Clochon, P., Mezenge, F., Denise, P., Foret, J.,... & Desgranges, B. <i>A combined neuropsychological and brain imaging study of obstructive sleep apnea</i> , Journal of Sleep Research (2009)		
G-90	Zakzanis, K.K. & Jeffay, E. <i>Neurocognitive variability in high-functioning individuals: Implications for the practice of clinical neuropsychology</i> , Psychological Reports (2011)		



G-91	Zane, K.L., Gfeller, J.D., Roskos, P.T., & Bucholz, R.D., The Clinical Utility of the Conners' Continuous Performance Test-II in Traumatic Brain Injury. Archives of Clinical Neuropsychology (2016)		
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## BOOKS

Number	Description	Offered	Admitted
G-92	Jack Jallo & Christopher M. Loftus, <i>Neurotrauma and Critical Care of the Brain</i>		

## DEMONSTRATIVES

Number	Description	Offered	Admitted
GD-93	Bayley: Schedule A- Documents Received Regarding Jerome Schmidt		
GD-94	Bayley: Lost Earnings And Household Contributions Resulting From Injury-Table		
GD-95	Bayley: Life Expectancy- Table		
GD-96	Bayley: Work Life Expectancy- Table		
GD-97	Bayley-Accumyn Plan 1-Life Care cost analysis-Update		
GD-98	Bayley-Accumyn Plan 2-Life Care cost analysis-Update		
GD-99	Bayley-Summary Life Care Cost Analysis Using Updated Inflation Rates		
GD-100	Bayley: Other Charts, Summaries, Diagrams or Spreadsheets, Other Comparisons.		
GD-101	Burns: Life Care Plan Tables		
GD-102	Burns: Life Care Plan Totals		
GD-103	Loftus: Summary Analysis Regarding Bigler, Lewine, Thoma, Synder		
GD-104	Loftus: Summary Chart-Why Majority List of 21 Initial Peer Review Articles Referenced As Supporting Plaintiff's Position Are Insupportable		
GD-105	Loftus: Summary of selected elements of Schmidt's past history (pre-accident)		
GD-106	Watson Figure 1: Scene photos		

GD-107	Watson Figure 2: Scene Photo of Toyota		
GD-108	Watson Figure 3: Exemplar Vehicle Lineup		
GD-109	Watson Figure 4: Approximate Alignment of Vehicles		
GD-110	Watson Figure 5: Crush Profile of Chevrolet (graph)		
GD-111	Watson Figure 6: Crush Profile of Chevrolet (photo & outline)		
GD-112	Watson Figure 7: Chevrolet van from NASS case 2010-75-158		
GD-113	Watson Figure 8: Chevrolet van from NASS case 2013-82-060		
GD-114	Watson Figure 9: Toyota from NASS case 2007-42-007		
GD-115	Watson Figure 10: Toyota from NASS case 2009-05-019		
GD-116	Watson Figure 11: Toyota 4Runner in NCAP 35 mph barrier impact test		
GD-117	Watson Figure 12: IIHS 40 mph barrier test of Toyota 4Runner		
GD-118	Watson Figure 13: Concussion Risk vs Head Acceleration from Rowson 2011		
GD-119	Watson Figure 14: Headinjury risk vs vehicle Delta-V from Viano 2015		
GD-120	Watson: Accident history, NASS Data (Oct. 2018)		
GD-121	Watson: Exemplar Photographs & Measurements		
GD-122	Watson: NASS CDS (2004-2015) (minor/moderate injuries)		
GD-123	Watson: NASS CDS (2004-2015) (no injuries)		
GD-124	Watson: Summary of Available Test Reports		
GD-125	Watson: Vehicle Information		
GD-126	Watson: VinLink Reports		
GD-127	Bayley Trial Exhibits		

GD-128	Boone Trial Demonstratives		
GD-129	Burns Trial Exhibits		
GD-130	Chalela Trial Exhibits		
GD-131	Loftus Trial Demonstratives		
GD-132	Watson Trial Exhibits		

Respectfully submitted,

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**Certificate of Service**

I certify that on November 12, 2019, I electronically filed this document with the Clerk of Court using the CM/ECF system.

☒ The CM/ECF system will send notification to the following CM/ECF participant(s):

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